

THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LINE CONSTRUCTION BENEFIT FUND,	)	
A HEALTH AND WELFARE FUND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO. 08C 1127
	)	
BSJ POWER SERVICES, INC., a Florida	)	Judge Norgle
Corporation,	)	
	)	Mag. Judge Cole
Defendant.	)	

**MOTION FOR DEFAULT JUDGMENT**

NOW COME the Plaintiff and moves this Honorable Court to enter a default judgment on behalf of the Plaintiff and against Defendant on the grounds that the Defendant has failed to answer or otherwise defend the complaint of the Plaintiff, a copy of which is attached as "Exhibit A." Defendant was served on March 8, 2008, as more fully stated on the Affidavit of Service, a copy of which is attached as Exhibit "B."

WHEREFORE, Plaintiff requests the following relief:

1. That default be entered against the Defendant herein, BSJ POWER SERVICES, INC., a Florida Corporation, and that the complaint filed herein be taken as confessed.
2. That judgment be entered forthwith against the Defendant and in favor of Plaintiff for the period September 1, 2007, through December 31, 2007, in the amount of \$3,040.00, for delinquent contributions and liquidated damages due.

3. That interest and/or liquidated damages be assessed against the Defendant as provided in the Collective Bargaining Agreement and the applicable provisions of the Pension Reform Act.

4. That the Defendant be ordered to comply with and perform according to the terms and conditions of its Collective Bargaining Agreement and the applicable provisions of ERISA as amended.

5. For such other and further relief as the Court may deem just and proper, including reasonable attorney's fees and court costs which are sustained.

/s/ Robert B. Greenberg  
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Dated: April 30, 2008